## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

C.A. No. 12-01319

FREEDOM FROM RELIGION :

FOUNDATION, INC., DOE 1, BY DOE 1'S

NEXT OF FRIEND AND PARENT,

MARIE SCHAUB, WHO ALSO SUES ON

HER OWN BEHALF, DOE 2, BY DOE 2'S

NEXT OF FRIEND AND PARENT DOE 3,

WHO ALSO SUES ON DOE'S OWN BEHALF,

\_\_\_\_,

Plaintiffs,

vs. : JURY TRIAL DEMANDED

NEW KENSINGTON-ARNOLD SCHOOL

DISTRICT,

Defendant.

## JOINT MOTION TO EXTEND TIME TO COMPLETE DISCOVERY

The parties, by and through their respective counsel, file the following Joint Motion to Extend Time to Complete Discovery:

- 1. By way of this Court's Order dated August 15, 2013, discovery was extended to close on September 22, 2013. The parties have continued to engage in discovery, but have not yet completed written discovery or conducted any depositions.
  - 2. The parties seek an extension of 90 days to complete discovery.
- 3. Discovery would be completed on or before December 21, 2013, if this Motion is granted.
  - 4. The parties also ask that the post-discovery status conference be rescheduled.
  - 5. The parties anticipate no further enlargements of the discovery period.

WHEREFORE, the parties respectfully requests this Honorable Court grant the within Motion and extend the deadline for completion of discovery by 90 days until December 21, 2013 and that the post-discovery status conference be rescheduled.

Respectfully submitted,

## ANDREWS & PRICE

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